

May 28, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS, MDL No. 3080
Parties' Submission on the Status of Plaintiff Fact Sheets

Dear Judge Singh:

Pursuant to the Court's May 13, 2024 Order directing counsel to meet and confer as discussed during the May 13, 2024 Case Management Conference [ECF 177], the parties provide the following status update regarding their conferral efforts as to a stipulated Plaintiff Fact Sheet (PFS) for use in the Self-Funded Payer and State Attorney General Tracks.

On May 22, 2024, Defendants provided Plaintiffs with their proposed initial topics and document requests for the PFS. The parties conferred the following day, with Plaintiffs advising Defendants that several of Defendants' proposed topics and requested documents appeared workable within the context of a PFS, subject to further discussion on their specific language and appropriate scope. Plaintiffs requested that Defendants provide specific proposed questions from their identified topics for inclusion in the PFS, as opposed to general topics, and otherwise committed to providing Defendants with proposed edits to the document requests. Plaintiffs provided those edits to the document requests to Defendants earlier today.

The parties agreed to continue to confer regarding the PFS and document requests between now and the next scheduled case management conference before Judge Martinotti on June 11, 2024, and propose submitting a status report to the Court in advance of the next CMC—by June 7, 2024.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi
James E. Cecchi
Liaison Counsel for
Third-Party Payer Class Track

/s/ David R. Buchanan
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Liaison Counsel for
Self-Funded Payer Track

/s/ Joanne Cicala
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Liaison Counsel for
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/s/ John D. Tortorella
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cc: Counsel of Record (via ECF)